

1 COOLEY LLP  
BOBBY GHAJAR (198719)  
2 (bghajar@cooley.com)  
COLETTE GHAZARIAN (322235)  
3 (cghazarian@cooley.com)  
1333 2nd Street, Suite 400  
4 Santa Monica, California 90401  
Telephone: (310) 883-6400  
5 MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
6 KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
7 JUDD LAUTER (290945)  
(jlauter@cooley.com)  
8 ELIZABETH L. STAMESHKIN (260865)  
(lstameshkin@cooley.com)  
9 3175 Hanover Street  
Palo Alto, California 94304-1130  
10 Telephone: (650) 843-5000

11 CLEARY GOTTlieb STEEN & HAMILTON LLP  
ANGELA L. DUNNING (212047)  
12 (adunning@cgsh.com)  
1841 Page Mill Road, Suite 250  
13 Palo Alto, California 94304  
Telephone: (650) 815-4131

14 *[Full Listing on Signature Page]*

15 *Counsel for Defendant Meta Platforms, Inc.*

16 UNITED STATES DISTRICT COURT  
17  
18 NORTHERN DISTRICT OF CALIFORNIA  
19  
20 SAN FRANCISCO DIVISION

20 RICHARD KADREY, *et al.*,  
21 Individual and Representative Plaintiffs,  
22 v.  
23 META PLATFORMS, INC., a Delaware  
corporation;  
24 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DEFENDANT META PLATFORMS, INC.'S  
RESPONSE TO COURT'S DISCOVERY ORDER  
OF DECEMBER 4, 2024 [DKT. 304]**

Pursuant to the Magistrate Judge’s Order on December 4, 2024 (Dkt. 304), Defendant Meta Platforms, Inc. (“Meta”) hereby submits as the attached **Exhibit 1** a copy of the Parties’ October 31, 2024 Joint Letter Brief (Dkt. 247) without a redaction on page seven.

Dated: December 5, 2024

COOLEY LLP

By: /s/ Cole A. Poppell

Bobby Ghajar  
Philip Morton  
Mark Weinstein  
Kathleen Hartnett  
Matthew Brigham  
Judd Lauter  
Liz Stameshkin  
Colette Ghazarian  
Juan Pablo Gonzalez  
Cole A. Poppell

LEX LUMINA PLLC  
Mark A. Lemley

CLEARY GOTTlieb STEEN &  
HAMILTON LLP  
Angela L. Dunning

Attorneys for Defendant  
META PLATFORMS, INC.

*Full Counsel List*

COOLEY LLP  
PHILLIP MORTON (*pro hac vice*)  
(pmorton@cooley.com)  
COLE A. POPPELL (*pro hac vice*)  
(cpoppell@cooley.com)  
1299 Pennsylvania Avenue, NW, Suite 700  
Washington, DC 20004-2400  
Telephone: (202) 842-7800

COOLEY LLP  
MATTHEW BRIGHAM (191428)  
(mbrigham@cooley.com)  
JUAN PABLO GONZALEZ (334470)  
(jgonzalez@cooley.com)  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Telephone: (650) 843-5000